

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

THOMAS ROGER WHITE, JR. and
PATRICIA CAULEY on behalf of
themselves and all others similarly
situated,

Plaintiffs,

v.

SAMSUNG ELECTRONICS
AMERICA, INC. and SONY
ELECTRONICS INC.,

Defendants.

Civil Action No. 17-1775 (MCA) (JAD)

Document Electronically Filed

**AFFIDAVIT OF PAUL BOND IN
SUPPORT OF MOTION TO
COMPEL INDIVIDUAL (NON-
CLASS) ARBITRATION**

I, Paul J. Bond, of full age, hereby certify as follows:

1. I am an attorney at law, licensed to practice in the U.S. District Court for the District of New Jersey, and an attorney at Holland & Knight LLP, attorneys for Defendant Sony Electronics Inc. (“Sony” or “Defendant”). As such, I am fully familiar with the facts set forth herein.

2. I make this affidavit in support of Defendant’s Motion to Compel Individual (non-class) Arbitration based on the End-User License Agreement EULA agreed to by plaintiff.

3. Attached hereto as **Exhibit A** is the Declaration of Timothy McGowan, Vice President of North America Consumer Service at Sony dated May 22, 2020.

4. On May 20, 2018, Defendant served Plaintiff with a Demand Letter. Attached hereto as **Exhibit B** is a true and correct copy of the Demand Letter.

I certify that the foregoing statements made by me are true to the best of my knowledge. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: Princeton, New Jersey
May 22, 2020

HOLLAND & KNIGHT LLP

By: /s/ Paul Bond
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*Attorneys for Defendant
Sony Electronics Inc.*